

## Mullins Documents

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Dara,

We reviewed the production of Mullins documents and they are incomplete. At the very least, we need the documentation from Shea and Tucker regarding the decision not to fire Mullins, and the trial transcript. Any representation to the Court that you have now fully complied with the Order would be false.

We also note you made numerous redactions and have not provided a privilege log.

And we have serious concerns about your claim that there are no documents related to the racist email. It was a widely reported incident. When will you be able to meet and confer regarding the steps you took to search for relevant documents.

Sincerely,

Rob Rickner

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